

Bridget Kohtz  
Frankfort, IN 46041

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FEDERAL ELECTION  
COMMISSION  
OFFICE OF GENERAL  
COUNSEL

2008 OCT 27 A 9 37

Original date: October 2, 2008  
Update: October 21, 2008

Federal Election Commission  
Attn: General Counsel—Retha Dixon, Docket Manager  
999 E. Street NW  
Washington, DC 20463

MUR # 6108

Re: Campaign Finance Complaint

Dear Sir or Ms.:

I am submitting a campaign finance complaint. Just this week it has come to my attention the suspicious nature of contributions made to Senator Barack Obama's presidential campaign. What has most concerned me today is an article stating an auditor within the FEC has asked his superiors to request a formal investigation into the Obama campaign and he is being rebuffed; in fact rebuffed four times in the last three months. The auditor has questioned more that \$200 million potentially illegal donations. I spoke with a person I believe was named Miles in your department who stated there have been other phone calls on this matter.

I understand that US citizens living abroad are entitled to make campaign donations. However, it is a crime for a campaign to accept donations from foreign nationals. There may have been donations to Obama's campaign made from Iran, t-shirts bought from the Gaza strip. How many US citizens live in those places? Bundles in excess of a quarter of a million dollars have come in from overseas. Then there's the rule that anyone making cumulative donations of \$200 must be identified. Two Obama donors who have received scrutiny were "Good Will" and "Doodad Pro" both employed by "Loving" with their stated profession "You" who made \$25 incremental donations that eventually totaled well over \$10,000 each. I understand that supposedly some of the money has been credited back to credit cards but there are amounts still not refunded. Meanwhile, I'm watching and hearing Obama ads, some of which are illegally funded, while he's laughing all the way to the bank.

Ordinary American citizens are sickened by the social engineering created by elected officials in the House and Senate that allowed Fannie Mae and Freddie Mac to circumvent accountability. That issue and now the lack of oversight by the Federal Election Commission into possibly illegal campaign contributions reinforces my lack of faith in the US government. Are you planning just a little slap on the wrist and maybe a fine after the election? It's too late then and you know it.

I expect you to investigate, demand immediate documentation of transactions, and then prosecute any campaign breaking the law. You need to communicate to the American people when illegality has occurred. That should happen for all campaigns. Anything less and you are not fulfilling your duty.

In the packet of information I received from Retha Dixon, Docket Manager, I understand that I needed to improve upon the notarization of this letter.

(Please proceed to back of this page)

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The complainant is: Bridget Kohtz

The respondent is: Barack Obama, the Barack Obama 2008 Presidential Campaign, Obama for America  
Chicago Illinois

I've included articles I've read in the past four weeks referring to the Barack Obama for President Campaign's failure to refund money; acceptance of more than allowed per person according to law, irregularities on Discover credit card charges in Missouri being investigated by the Missouri Attorney General, possible acceptance of foreign contributions. These articles are from Newsmax, ABC News - Jake Tapper, National Review online, qando.net. There is also an article from The American Spectator regarding the unnamed auditor at the FEC requesting assistance for further investigation.

Sincerely,



Bridget Kohtz  
Frankfort, Indiana

STATE OF INDIANA )

)ss:

COUNTY OF CLINTON )

Before me, the undersigned, a Notary Public in and for said County and State, personally appeared Bridget Kohtz, and she, being first duly sworn by me upon her oath, says that the facts alleged in the foregoing instrument are true.

Subscribed and sworn to before me on this 21<sup>st</sup> day of October, 2008.



Amy S. Heidt, Notary Public

Residing in Clinton County, IN  
My Commission Expires: 8/17/08

Copies of the original letter were sent Oct. 2, 2008 to:

cc: Department of Justice, ABC News, CBS News, NBC News, Fox News, Indianapolis Star

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**FUNNY MONEY**

An auditor told the Federal Election Commission is attempting to have his bosses seek a formal investigation into the collection by the Obama for President campaign of more than \$200 million in potentially illegal political donations, including millions of dollars of illegal, foreign donations, and has sought a request for assistance from the Department of Justice or Federal Bureau of Investigation. But the analyst's requests have largely been ignored. "I can't get anyone to move. I believe we are looking at a hijacking of our political system that makes the Clinton and Gore fundraising scandals pale in comparison. And no one here wants to touch it."

One reason cited by his superiors, says the analyst, is that involvement by the Justice Department or FBI would be indicative of a criminal investigation, something the FEC would prefer not take place a month before the presidential election. Such actions, though, have been used to scuttle Republican campaigns in the past, the most famous being the Weinberger case in the days leading up to the 1992 re-election bid of President George H.W. Bush.

The analyst, who declines to be identified for fear of retaliation, says that on four different occasions in the past three months, he sought to open formal investigations into the Obama campaign's fundraising techniques, but those investigations have been discouraged. "Without formal approval, I can't get the resources I need, manpower, that kind of thing. This is a huge understating." And the analyst says that he believes that campaign finance violations have occurred.

The Obama campaign has already had to deal with several FEC complaints about fraudulent donors and illegal foreign contributions, and the FEC says it has no record that those complaints have been resolved or closed. As well, the Obama campaign has been cagey at times about the means by which it has made its historic fundraising haul, which now total almost \$600 million for the election cycle. The Hillary Clinton campaign raised questions about the huge amount of e-retail sales the Obama campaign was making for such things as t-shirts and other campaign paraphernalia, and how such sales were being tracked and used for fundraising purposes. Within the profits of those same-courtesy against the \$2,300 personal donation limit, there have always been lingering questions about the e-retail system.

"The question has always been, if you buy a \$25 t-shirt and you go back to that purchaser eight or nine times with email appeals for \$200 or \$500 donations, and you have people donating like that all the time, at what point does the campaign bother to check if the FEC limit has been exceeded?" says a former Clinton campaign fundraiser. "There are enough of us from the 1992 and 1996 and 2000 races around to know that many of these kinds of violations never get caught until after the election has been won or lost. In this case, there is no way the Obama campaign will be held accountable before Election Day, unless someone raises holy hell."

The FEC analyst says that Obama's filings indicate he has received large, bundled sums of contributions from unknown, sometimes untraceable, individuals millions of dollars. "It's suspicious, but it's the small donations made by credit card that need to be examined. We've raised red flags on many occasions and the Obama campaign just ignores us. After this election, after we've sifted through everything — if we're allowed to sift through everything — I am confident that we are looking at perhaps the largest fine ever levied against a national campaign entity."

Just as frustrating as the lack of desire on the part of his bosses to act, says the analyst, is that the mainstream outlets have ignored the story he has been attempting to tell. Thus far, his only outlet is one of the few publications to cover the Obama campaign finance scam story.

*From Bridget Kelly*

Newsmax.com

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From Budget King

2008 OCT 27 A 9 38  
**Secret, Foreign Money Floods Into Obama Campaign**

Monday, September 29, 2008 9:23 PM

By: Kenneth R. Timmerman

More than half of the whopping \$426.9 million Barack Obama has raised has come from small donors whose names the Obama campaign won't disclose.

And questions have arisen about millions more in foreign donations the Obama campaign has received that apparently have not been vetted as legitimate.

Obama has raised nearly twice that of John McCain's campaign, according to new campaign finance report.

But because of Obama's high expenses during the hotly contested Democratic primary season and an early decision to forgo public campaign money and the spending limits it imposes, all that cash has not translated into a financial advantage — at least, not yet.

The Obama campaign and the Democratic National Committee began September with \$95 million in cash, according to reports filed with the Federal Election Commission (FEC).

The McCain camp and the Republican National Committee had \$94 million, because of an influx of \$84 million in public money.

But Obama easily could outpace McCain by \$50 million to \$100 million or more in new donations before Election Day, thanks to a legion of small contributors whose names and addresses have been kept secret.

Unlike the McCain campaign, which has made its complete donor database available online, the Obama campaign has not identified donors for nearly half the amount he has raised, according to the Center for Responsive Politics (CRP).

Federal law does not require the campaigns to identify donors who give less than \$200 during the election cycle. However, it does require that campaigns calculate running totals for each donor and report them once they go beyond the \$200 mark.

Surprisingly, the great majority of Obama donors never break the \$200 threshold.

"Contributions that come under \$200 aggregated per person are not listed," said Bob Biersack, a spokesman for the FEC. "They don't appear anywhere, so there's no way of knowing who they are."

The FEC breakdown of the Obama campaign has identified a staggering \$222.7 million as coming from contributions of \$200 or less. Only \$39.6 million of that amount comes from donors the Obama

campaign has identified.

It is the largest pool of unidentified money that has ever flooded into the U.S. election system, before or after the McCain-Feingold campaign finance reforms of 2002.

Biersack would not comment on whether the FEC was investigating the huge amount of cash that has come into Obama's coffers with no public reporting.

But Massie Ritsch, a spokesman for CRP, a campaign-finance watchdog group, dismissed the scale of the unreported money.

"We feel comfortable that it isn't the \$20 donations that are corrupting a campaign," he told Newsmax.

But those small donations have added up to more than \$260 million, all of it from unknown and unreported donors.

Ritsch acknowledges that there is skepticism about all the unreported money, especially in the Obama campaign coffers.

"We and seven other watchdog groups asked both campaigns for more information on small donors," he said. "The Obama campaign never responded," whereas the McCain campaign "makes all its donor information, including the small donors, available online."

The rise of the Internet as a campaign funding tool raises new questions about the adequacy of FEC requirements on disclosure. In pre-Internet fundraising, almost all political donations, even small ones, were made by bank check, leaving a paper trail and limiting the amount of fraud.

But credit cards used to make donations on the Internet have allowed for far more abuse.

"While FEC practice is to do a post-election review of all presidential campaigns, given their sluggish metabolism, results can take three or four years," said Ken Boehm, the chairman of the conservative National Legal and Policy Center.

Already, the FEC has noted unusual patterns in Obama campaign donations among donors who have been disclosed because they have gone beyond the \$200 minimum.

### FEC and Mr. Doodad Pro

When FEC auditors have questions about contributions, they send letters to the campaign's finance committee requesting additional information, such as the complete address or employment status of the donor.

Many of the FEC letters that Newsmax reviewed instructed the Obama campaign to "redesignate" contributions in excess of the finance limit.

Under campaign finance laws, an individual can donate \$2,300 to a candidate for federal office in both the primary and general election, for a total of \$4,600. If a donor has topped the limit in the primary, the campaign can "redesignate" the contribution to the general election on its books.

In a letter dated June 25, 2008, the FEC asked the Obama campaign to verify a series of \$25 donations

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from a contributor identified as "Will, Good" from Austin, Texas.

Mr. Good Will listed his employer as "Loving" and his profession as "You."

A Newsmax analysis of the 1.4 million individual contributions in the latest master file for the Obama campaign discovered 1,000 separate entries for Mr. Good Will, most of them for \$25.

In total, Mr. Good Will gave \$17,375.

Following this and subsequent FEC requests, campaign records show that 330 contributions from Mr. Good Will were credited back to a credit card. But the most recent report, filed on Sept. 20, showed a net cumulative balance of \$8,958 — still well over the \$4,600 limit.

There can be no doubt that the Obama campaign noticed these contributions, since Obama's Sept. 20 report specified that Good Will's cumulative contributions since the beginning of the campaign were \$9,375.

In an e-mailed response to a query from Newsmax, Obama campaign spokesman Ben LaBolt pledged that the campaign would return the donations. But given the slowness with which the campaign has responded to earlier FEC queries, there's no guarantee that the money will be returned before the Nov. 4 election.

Similarly, a donor identified as "Pro, Doodad," from "Nanda, NY," gave \$19,500 in 786 separate donations, most of them for \$25. For most of these donations, Mr. Doodad Pro listed his employer as "Loving" and his profession as "You," just as Good Will had done.

But in some of them, he didn't even go this far, apparently picking letters at random to fill in the blanks on the credit card donation form. In these cases, he said he was employed by "VCX" and that his profession was "VCVC."

Following FEC requests, the Obama campaign began refunding money to Doodad Pro in February 2008. In all, about \$8,425 was charged back to a credit card. But that still left a net total of \$11,165 as of Sept. 20, way over the individual limit of \$4,600.

Here again, LaBolt pledged that the contributions would be returned but gave no date.

In February, after just 93 donations, Doodad Pro had already gone over the \$2,300 limit for the primary. He was over the \$4,600 limit for the general election one month later.

In response to FEC complaints, the Obama campaign began refunding money to Doodad Pro even before he reached these limits. But his credit card was the gift that kept on giving. His most recent un-refunded contributions were on July 7, when he made 14 separate donations, apparently by credit card, of \$25 each.

Just as with Mr. Good Will, there can be no doubt that the Obama campaign noticed the contributions, since its Sept. 20 report specified that Doodad's cumulative contributions since the beginning of the campaign were \$10,965.

### Foreign Donations

And then there are the overseas donations — at least, the ones that we know about.

The FEC has compiled a separate database of potentially questionable overseas donations that contains more than 11,500 contributions totaling \$33.8 million. More than 520 listed their "state" as "IR," which the FEC often uses as an abbreviation for "information requested." Another 63 listed it as "UK," the United Kingdom.

More than 1,400 of the overseas entries clearly were U.S. diplomats or military personnel, who gave an APO address overseas. Their total contributions came to just \$201,680.

But others came from places as far afield as Abu Dhabi, Addis Ababa, Beijing, Fallujah, Florence, Italy, and a wide selection of towns and cities in France.

Until recently, the Obama Web site allowed a contributor to select the country where he resided from the entire membership of the United Nations, including such friendly places as North Korea and the Islamic Republic of Iran.

Unlike McCain's or Sen. Hillary Clinton's online donation pages, the Obama site did not ask for proof of citizenship until just recently. Clinton's presidential campaign required U.S. citizens living abroad to actually fax a copy of their passport before a donation would be accepted.

With such lax vetting of foreign contributions, the Obama campaign may have indirectly contributed to questionable fundraising by foreigners.

In July and August, the head of the Nigerian's stock market held a series of pro-Obama fundraisers in Lagos, Nigeria's largest city. The events attracted local Nigerian business owners.

At one event, a table for eight at one fundraising dinner went for \$16,800. Nigerian press reports claimed sponsors raked in an estimated \$900,000.

The sponsors said the fundraisers were held to help Nigerians attend the Democratic convention in Denver. But the Nigerian press expressed skepticism of that claim, and the Nigerian public anti-fraud commission is now investigating the matter.

Concerns about foreign fundraising have been mixed by other anecdotal accounts of illegal activities.

In June, Libyan leader Moammar Gadhafi gave a public speech praising Obama, claiming foreign nationals were donating to his campaign.

"All the people in the Arab and Islamic world and in Africa applauded this man," the Libyan leader said. "They welcomed him and prayed for him and for his success, and they may have even been involved in legitimate contribution campaigns to enable him to win the American presidency..."

Though Gadhafi asserted that fundraising from Arab and African nations were "legitimate," the fact is that U.S. federal law bans any foreigner from donating to a U.S. election campaign.

The rise of the Internet and use of credit cards have made it easier for foreign nationals to donate to American campaigns, especially if they claim their donation is less than \$200.

Campaign spokesman LaBolt cited several measures that the campaign has adopted to "root out fraud,"

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including a requirement that anyone attending an Obama fundraising event overseas present a valid U.S. passport, and a new requirement that overseas contributors must provide a passport number when donating online.

One new measure that might not appear obvious at first could be frustrating to foreigners wanting to buy campaign paraphernalia such as T-shirts or bumper stickers through the online store.

In response to an investigation conducted by blogger Pamela Geller, who runs the blog Atlas Shrugs, the Obama campaign has locked down the store.

Geller first revealed on July 31 that donors from the Gaza strip had contributed \$33,000 to the Obama campaign through bulk purchases of T-shirts they had shipped to Gaza.

The online campaign store allows buyers to complete their purchases by making an additional donation to the Obama campaign.

A pair of Palestinian brothers named Hosam and Monir Edwan contributed more than \$31,300 to the Obama campaign in October and November 2007, FEC records show.

Their largesse attracted the attention of the FEC almost immediately. In an April 15, 2008, report that examined the Obama campaign's year-end figures for 2007, the FEC asked that some of these contributions be reassigned.

The Obama camp complied sluggishly, prompting a more detailed admonishment from the FEC on July 30.

The Edwan brothers listed their address as "GA," as in Georgia, although they entered "Gaza" or "Rafah Refugee camp" as their city of residence on most of the online contribution forms.

According to the Obama campaign, they wrongly identified themselves as U.S. citizens, via a voluntary check-off box at the time the donations were made.

Many of the Edwan brothers' contributions have been purged from the FEC database, but they still can be found in archived versions available for CRP and other watchdog groups.

The latest Obama campaign filing shows that \$891.11 still has not been refunded to the Edwan brothers, despite repeated FEC warnings and campaign claims that all the money was refunded in December.

A Newsmax review of the Obama campaign finance filings found that the FEC had asked for the redesignation or refund of 53,828 donations, totaling just under \$30 million.

But none involves the donors who never appear in the Obama campaign reports, which the CRP estimates at nearly half the \$426.8 million the Obama campaign has raised to date.

Many of the small donors participated in online "matching" programs, which allow them to hook up with other Obama supporters and eventually share e-mail addresses and blogs.

The Obama Web site described the matching contribution program as similar to a public radio fundraising drive.

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"Our goal is to bring 50,000 new donors into our movement by Friday at midnight," campaign manager David Plouffe e-mailed supporters on Sept. 15. "And if you make your first online donation today, your gift will go twice as far. A previous donor has promised to match every dollar you donate."

FEC spokesman Biersack said he was unfamiliar with the matching donation drive. But he said that if donations from another donor were going to be reassigned to a new donor, as the campaign suggested, "the two people must agree" to do so.

This type of matching drive probably would be legal as long as the matching donor had not exceeded the \$2,300 per-election limit, he said.

Obama campaign spokesman LaBolt said, "We have more than 2.5 million donors overall, hundreds of thousands of which have participated in this program."

Until now, the names of those donors and where they live have remained anonymous — and the federal watchdog agency in charge of ensuring that the presidential campaigns play by the same rules has no tools to find out.

#### CLARIFICATION

The original version of this story, published on this Web site Sept. 29, reported that the "IR" listed on 520 overseas donations is "often an abbreviation for Iran."

However, FEC spokesman Ben Biersack said Oct. 7 that "IR" generally means "information requested," not Iran. "That's often, but not always, what it means," he said.

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From Budget Hike

2008 OCT 27 A 9 38

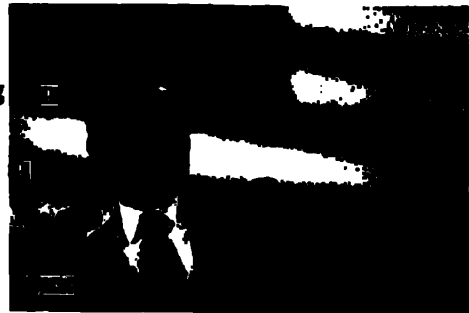
## Obama's Secret Campaign Cash: Has \$63 Million Flowed from Foreign Sources?

Sunday, October 19, 2008 6:28 PM

By: Kenneth R. Timmerman

As Barack Obama reaped a stunning \$150 million in campaign donations in September, bringing his total to more than \$600 million, new questions have arisen about the source of his amazing funding.

By Obama's own admission, more than half of his contributions have come from small donors giving \$200 or less. But unlike John McCain's campaign, Obama won't release the names of these donors.



A Newsmax canvass of disclosed Obama campaign donors shows worrisome anomalies, including outright violations of federal election laws.

For example, Obama has numerous donors who have contributed well over the \$4,600 federal election limit.

Many of these donors have never been contacted by the Obama campaign to refund the excess amounts to them.

And more than 37,000 Obama donations appear to be conversions of foreign currency.

According to a Newsmax analysis of the Obama campaign data before the latest figures were released, potential foreign currency donations could range anywhere from \$12.8 million to a stunning \$63 million in all. With the addition of \$150 million raised in September, this amount could be much more.

When asked by Newsmax about excess contributions, Obama spokesman Ben LaBolt said that contributions already identified as excess had been returned and that those the campaign was just learning about – either through news accounts or from the Federal Election Commission – “will be returned.”

“Every campaign faces the challenge of screening and reviewing its contributions,” LaBolt said. “And we have been aggressive about taking every available step to make sure our contributions are appropriate, updating our systems when necessary.”

But many of the donors Newsmax canvassed said they had “never” been contacted by the Obama campaign or seen any refunds, even though their contributions went over the limit months ago.

In all, Newsmax found more than 2,000 donors who had contributed in excess of the \$4,600 limit for individuals per election cycle.

Such donations, if not returned within 60 days, are a clear violation of federal campaign finance laws.

Lisa Handley, a stay-at-home mom from Portland, Ore., recalled giving \$4,600 to the Obama campaign by credit card, contributions she made because "I love Obama," she said.

According to FEC records, however, she gave an additional \$2,300 to the campaign, putting her over the limit.

The Obama campaign reported that it had "redesignated" the excess money, which could mean that it had contributed it to a separate party committee or a joint fundraising committee, which have higher limits.

But if that happened, it's news to Handley. "No one ever contacted me to return any of the money or told me they were redesignating some of the money," she said.

Ronald J. Sharpe Jr., a retired teacher from Rockledge, Fla., appears in the Obama campaign reports as having given a whopping \$13,800.

The campaign reported that it returned \$4,600 to him, making his net contribution of \$9,200 still way over the legal limit.

But there's one problem with the Obama data: Sharpe doesn't remember giving that much money to the Obama campaign in the first place, nor does he recall anyone from the campaign ever contacting him to return money.

"At the end, I was making monthly payments," he told Newsmax. The Obama campaign records do not show any such payments.

Many donors refused to answer questions about the political campaign contributions appearing in their name when they learned that the caller was from a news organization.

John Atkinson, an insurance agent in Burr Ridge, Ill., refused to discuss his contributions, which totaled \$8,724.26, before numerous refunds.

Atkinson and others gave in odd amounts: \$188.67, \$1,542.06, \$876.09, \$388.67, \$282.20, \$195.66, \$118.15, and one rounded contribution of \$2,300.

Sandra Daneshinia, a self-employed caregiver from Los Angeles, made 36 separate contributions, totaling \$7,051.12, according to FEC records. Thirteen of them were eventually refunded.

In a bizarre coincidence, those 13 refunded contributions — for varying amounts such as \$223.88 and \$201.44 — added up exactly to \$2,300, the amount an individual may give per federal election.

Also giving in odd amounts was Robert Porter, an accountant for the town of Oviedo, Fla. Porter gave a surprising \$4,786.02 to the Obama campaign.

In all, Newsmax found an astonishing 37,265 unique donors to the Obama campaign whose contributions were not rounded up to dollar amounts. That amounts to more than 10 percent of the total number of unique donors whose names have been disclosed by the Obama campaign to the public.

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Of those, 44,410 contributions came in unrounded amounts of less than \$100. FEC regulations only require that campaigns disclose the names of donors who have given a total of \$200 or more, so that means that all these contributors were repeat donors.

Another 15,269 contributions gave in unrounded amounts between \$101 and \$999, while 704 of the unrounded contributions were in amounts of more than \$1,000.

Campaign finance experts find the frequent appearance of unrounded contributions suspicious, since contributors almost invariably give in whole dollar amounts.

One expert in campaign finance irregularities offers a possible explanation.

"Of course this is odd. They are obviously converting from local currency to U.S. dollars," said Ken Boehm, the chairman of the National Legal and Policy Center.

"The overwhelming number of large dollar contributors -- and even small donors -- are in even dollar amounts," he told Newsmax. "Anyone who doubts that can go to FEC.gov and look through the campaign contribution data bases. You will not find many uneven numbers."

Boehm said he had rarely seen unrounded contributions in his 30 years as a lawyer doing campaign finance work.

"There's always the odd one who wants to round up his checkbook, but they are very rare," he said.

Richard E. Hug, a veteran Republican fundraiser in Maryland who who raised hundreds of thousands of dollars for George W. Bush in 2000 and 2004, and spearheaded the successful 2002 gubernatorial race for Bob Ehrlich that brought in a record \$10 million, told Newsmax that unrounded contributions were extremely unusual.

"I've never seen this in all my years of raising money for political candidates," he said. "The first thing it suggests is foreign currency transactions -- contributions from foreign donors, which is clearly illegal."

Top Republican fundraiser Steve Gordan, who has raised \$65 million for GOP candidates over the past 30 years, told Newsmax that such contributions in uneven amounts would be "pretty unusual."

"You might have a rounding process if there was some kind of joint event, but since all appears to be on the Internet, it's pretty unusual. At the very least, it would need to be explored."

LaBolt attributed the uneven amounts to the online "Obama store," which sells T-shirts and other campaign items.

"Contributions made to the Obama store often produce totals that are not exact dollar amounts," he said.

But the campaign has never produced any accounting for proceeds from its online store, which virtually shut down several weeks ago after Newsmax and news organizations revealed that Palestinians from the Gaza Strip and other foreigners had made large purchases there.

The Republican National Committee has filed a complaint against the Obama campaign for "accepting prohibited contributions from foreign nationals and excessive contributions from individuals," which

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incorporated reporting from Newsmax and other news organizations.

"Their responses to FEC inquiries have often been inadequate and late," RNC general counsel Sean Cairncross told Newsmax.

The Obama camp claims to have 2.5 million donors in all. But until now, they have kept secret the names of the overwhelming majority of these money-givers. According to a Newsmax analysis, the Obama campaign finance records contain just 370,448 unique names.

Even accounting for common names such as Robert Taylor or Michael Brown, which can signify multiple donors, Obama's publicly known donor base is less than 20 percent of the total number of donors the campaign claims to have attracted. But the identity of the other 2 million donors is being kept secret.

As of the end of August, those secret donors have given an incredible \$222.7 million to Obama, according to the FEC — money whose origin remains unknown to anyone other than Obama's finance team, who won't take calls from the press.

While no exact figures are available, if the same percentage of potential foreign contributions found in the itemized contribution data is applied to the total \$426.9 million the Obama camp says it has taken in from individuals, this could mean that Obama is financing his presidential campaign with anywhere from \$13 million to a whopping \$63 million from overseas credit cards or foreign currency purchases.

The sum of all unrounded contributions in the itemized FEC filings for the Obama campaign comes to \$6,437,066.07. That is the actual amount of money that appears to have been charged to foreign credit cards that the Obama campaign has disclosed.

If the same ratio applies to the unitemized contributions, which are again as large, then the Obama campaign may have taken as much as \$13 million from foreign donors.

However, the donors who made those unrounded contributions gave a total of \$31,484,584.27, meaning that as much as \$63 million may have come from questionable sources.

Both presidential campaigns are required to submit detailed fundraising reports for September on Monday.

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OFFICE OF GENERAL  
COUNSEL

From Budget Kshy

Wednesday, October 01, 2008

Obama's Funny Money, or Who's "Loving" You, Barry? [Andy McCarthy]  
Mr. "Good Will," apparently.

My pal Diana West points me to Ken Timmerman's must-read Newmax column — which naturally is getting no coverage in the MSM — about Sen. Obama's eye-popping fundraising operation. Bottom line: the would-be President of the World is raising gobs of money from foreigners outside the United States (a violation of federal law), and matching goo-gobs of money inside the United States from phantoms who are blowing out the individual contribution limits by, among other devices, making up identities and breaking up contributions in amounts less than \$200, for which reporting requirements are less rigorous.

According to Ken, the Obama campaign has raised nearly half a billion dollars (\$429.6M) but refuses to provide the names of most of the donors. Election law requires the campaign to track this information but not for it to disclose the names of those who donate less than \$200, which is most Obama donors. (Sen. McCain discloses the names of all donors.) The Obama campaign has raised millions upon millions of dollars from outside the United States. Only Americans living overseas may lawfully contribute, but because the Obama voting machinery is negligent (or worse), the probability is that enormous sums are coming from foreigners. The campaign knows the FEC is a lethargic agency and won't have a full accounting until perhaps years after the election.

This typifies the domestic fundraising issue:

In a letter dated June 25, 2008, the FEC asked the Obama campaign to verify a series of \$25 donations from a contributor identified as "Will, Good" from Austin, Texas. Mr. Good Will listed his employer as "Loving" and his profession as "You."

A Newmax analysis of the 1.4 million individual contributions in the latest master file for the Obama campaign discovered 1,000 separate entries for Mr. Good Will, most of them for \$25. In total, Mr. Good Will gave \$17,375.

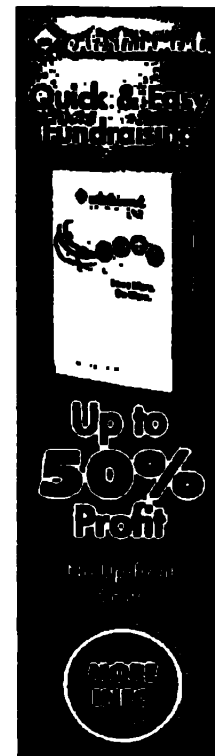
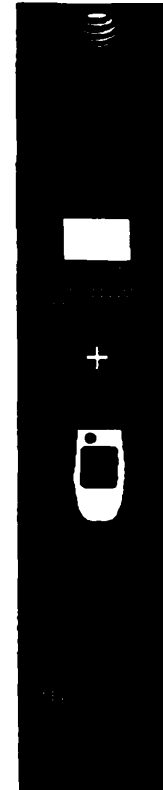
Following this and subsequent FEC requests, campaign records show that 330 contributions from Mr. Good Will were credited back to a credit card. But the most recent report, filed on Sept. 20, showed a net cumulative balance of \$5,850 — still well over the \$4,600 limit.

There can be no doubt that the Obama campaign noticed these contributions, since Obama's Sept. 20 report specified that Good Will's cumulative contributions since the beginning of the campaign were \$5,375.

In an e-mailed response to a query from Newmax, Obama campaign spokesman Ben LaBolt pledged that the campaign would return the donations. But given the slowness with which the campaign has responded to earlier FEC queries, there's no guarantee that the money will be returned before the Nov. 4 election.

Similarly, a donor identified as "Pro, Doodad," from "Nando, NY," gave \$19,800 in 788 separate donations, most of them for \$25. For most of these donations, Mr. Doodad Pro listed his employer as "Loving" and his profession as "You," just as Good Will had done. But in some of them, he didn't even go this far, apparently picking letters at random to fill in the blanks on the credit card donation form. In these cases, he said he was employed by "VCX" and that his profession was "VCVC."

Following FEC requests, the Obama campaign began refunding multiple Doodad Pro in February 2008. In all, about \$6,400 was charged back to a credit card. But that still leaves a net total of \$13,400 as of Sept. 20, way over the individual limit of \$4,600. Here again, LaBolt pledged that the contributions would be



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## Political Punch

Power, pop, and probings from ABC News Senior National Correspondent Jake Tapper



Jake Tapper is ABC News' Senior National Correspondent based in the network's Washington bureau. He writes about politics and popular culture and covers a range of national stories.

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### Those Undisclosed Obama Donors

October 21, 2008 8:50 AM

In an attempt at political jujitsu (soon to enter the Hall of Verbotten Clichés -- but not yet), the McCain campaign and the RNC have been attempting to put Sen. Barack Obama, D-Ill., on the defensive about his record-shattering fundraising, which includes an unprecedented \$150 million September.

Obama, of course, opted out of public financing despite an earlier pledge to do so, an issue of real contention for Sen. John McCain, R-Ariz., who (rightly) feels it's a broken promise Obama hasn't gotten much heat for from either the media or government reform proponents.

More recently, Republicans have been pointing out that Obama does not disclose the names of donors who contribute less than \$200 to his campaign. He is under no legal obligation to do so, but his failure to provide those names, it can certainly be argued, doesn't live up to his pledges of transparency and optimism.

*From Bridget Kelly*

Ergo, the Republican National Committee today introduced a searchable public database of un-itemized RNC donors – those who contributed less than \$200 to the RNC from the time when John McCain became the presumptive Republican presidential nominee.

You can access it [HERE](#).

"Sen. Obama talks a lot about openness and transparency, but Republicans walk the walk. Here we have another example of Obama's rhetoric in no way matching his record," RNC Chairman Mike Duncan said in a statement. "When will Barack Obama stand up and follow through on his rhetoric? When will he stop talking about leadership and exhibit it?"

And yesterday, McCain campaign manager Rick Davis laid a conference call on the subject.

Davis called Obama's \$1.6B million September "an extraordinary amount of money, and an unbelievable track record for somebody who no question will go down in political history regardless of the outcome of this election as the greatest fundraiser in Presidential political history."

That said, Davis went on – per ABC News' Anneke Datta – "it brings up though, an important, an important question for this campaign. From Day One, Barack Obama said he was going to bring in a new style of politics, he talked about being the most transparent campaign seen today. In fact, has challenged other people on their transparency throughout the course of the election, whether it was his primary opponents or others, and what is most amazing is that regardless of repeated calls and questions in the media about his contributions and what he's done, he has refused to – to this point release any of his donors under two hundred dollars a piece."

"Obviously in order to raise a hundred and fifty million, he has had to include again hundreds of thousands if not close to a million new donors into his campaign," Davis said. "And what is also something that I think is important to note, is that it is the first campaign since the Watergate era that has taken primary fundraising efforts and driven it all the way through and into the general election. So not only are the donors that he has received in September an important question mark as to why these aren't being disclosed, but all the donations that he got during the primary are unusable in the general election. It's the first time that's ever happened, and it raises questions about you know, what of these donors too were qualified, and why to trust the Obama campaign reporting them? Clearly they have a significant internet capacity, there's no question that technology allows this to happen."

Davis said that he has "no doubt that you know, the vast majority of these are probably legitimate. But they're being kept secret by the Obama campaign, for no good reason."

I myself haven't heard a good reason as to why Obama is refusing to disclose the names of these donors, unlike the McCain campaign.

Have you heard one? Do you care?

– jst

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## ADD CREDIT CARD FRAUD TO THE LIST

Posted by: M2Q

Every passing day the Obama campaign seems more Chicago machine politics and less "man politics".

2008 OCT 27 A 9 38

At least four credit card holders in Missouri have recently opened their statements and found unauthorized transactions, which charged \$2,300 to the presidential campaign of Sen. Barack Obama.

It happened to Tom Brown and his wife a couple weeks ago. They became aware of it after Discover sent them an e-mail about an unusually large purchase.

"My wife said, 'Get my credit right away, she called Discover to cancel the card,' Brown said. "I talked to Discover about it, and they said it looks like it was keyed in from Chicago."

Specifically, the e-mail indicated the charge came from Obama for America Chicago Illinois. The Browns went able to get the charge refunded by Discover.

"It was under his name. Under 'merchant,' it read 'Obama for America.' And we basically would not give a politician \$2,300 dollars. We would not give any politician, probably, a dollar. And I really, basically, don't know who's at fault, for this, or who did what," Brown said. "But someone out there is trying to hit people's charges and collect money. We were just interested in letting other people know that this could happen to them."

Brown pointed out this was not a story about politics; it's about credit card fraud.

Of course the Obama campaign has flatly denied any responsibility for the charges, even though, apparently, the charge was keyed in Chicago and the money went to the campaign. They also seem to be working closely with authorities about the charges.

They're just not responsible for much of anything are they?

A spokesperson for the Missouri Attorney General's office has told the Associated Press that they were investigating a "handful" of similar incidents.

By any means necessary.

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*From Bridget Kelly*